

**Gentner**

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January 18, 1995

Office of the Secretary  
Federal Communications Corporation  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

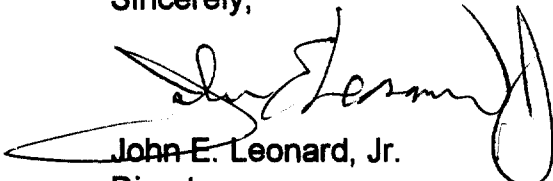
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RE: FCC 94-289, MM Docket No. 94-130

Gentlemen:

Enclosed is an original and nine (9) copies of the comments of Gentner Communications Corporation in relation to this proceeding.

Sincerely,

  
John E. Leonard, Jr.  
Director,  
Broadcast Site Control Products

JEL/ecg

enclosures

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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JAN 19 1995

COMMUNICATIONS

In the Matter of: )

)  
)  
Amendment of Parts 73 and 74 of )  
the Commission's Rules to permit )  
unattended operation of broadcast )  
stations and to update broadcast )  
station transmitter control and )  
monitoring requirements. )

MM Docket 94-130

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**COMMENTS OF GENTNER COMMUNICATIONS CORPORATION**

Gentner Communications Corporation hereby submits its comments in response to the Notice of Inquiry<sup>1</sup> in the above-captioned proceeding. In the Notice, the Commission has solicited comments regarding the proposed changes to operator requirements and update various requirements relating to transmitter control. Gentner will limit its comments to those relating to broadcast transmitter operation and control.

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<sup>1</sup> Amendment of Parts 73 and 74 of the Commission's Rules to permit unattended operation of broadcast stations and to update broadcast station transmitter control and monitoring requirements, MM Docket 94-130, Notice of Proposed Rule Making, FCC No. 94-289 (November 10, 1994) (hereinafter "Notice").

### **Interest of Gentner**

1. Gentner is a publicly held Utah corporation that develops, manufactures and distributes communications equipment to the broadcast, professional audio and teleconferencing industries.

2. Gentner applauds the Commission's addressing of these issues. In 1985 Gentner presented a product specifically designed to allow the operation of broadcast transmitters in a manner resembling many of the attributes presented in this proceeding.

### **DISCUSSION**

3. Gentner is supportive of the establishment of Rules that clarify and allow the broadcaster to use the capabilities of technologies in existence. These can result in a more efficient and reliable broadcasting system.

4. From commentary with existing users of Gentner products of this type the benefits have been found to be diverse. These have included increasing the observation of the operation of the transmitter plant, decreasing the air-time lost to failures, and lowering operating costs of a station. No single point seems to

overshadow another in this observation. Each has its own compelling point.

5. Gentner believes that all changes suggested in this proceeding are appropriate. Technologies are (or will shortly be) in existence permitting a licensee, at an affordable cost, to implement a system that meets their exact needs.

6. A meaningful point is Rules that permit the licensee to determine its exact needs for complying with the Rules. A blending of what has been specifically automatic transmission system (ATS) with what has been considered simply remote control makes eminent sense.

7. This does not eliminate the need of establishing minimal requirements for licensees to observe. The sections 73.1300, 73.1350 and 73.1400 presented in the Notice seem to present workable parameters.

8. We would suggest consideration of the time period of three (3) minutes for termination under some circumstance in the Notice under the proposed 73.1350, (a),(2) and (d). This period, while workable, may in some situations be of too short a duration.

We would suggest a variable time period, such as 3 to 5 minutes.

This would allow the licensee the flexibility of configuring his system to meet all the needs of that specific situation.

### **Conclusion**

Gentner believes the proposed changes in the Notice will result in improved operation of broadcast facilities. Technologies are already in use at many stations to fulfill the intent of the Notice and further enhanced capabilities will be available shortly.

Date: 18 January 1995

Respectfully submitted,  
Gentner Communications Corporation

By: 

John E. Leonard, Jr.

Director,

Broadcast Site Control Products